

DCG

Prevent Risk Register & Action Plan – 2020-2021

(Informed by the Derby City/Derbyshire Counter Terrorism Local Profile & FE/HE Derby City Prevent Coordinator)

Risk Scoring

Likelihood		Consequence	
Highly likely	5	Very high	5
Likely	4	High	4
Even chance	3	Medium	3
Unlikely	2	Low	2
Very unlikely	1	Very low	1

Risk score

High (Red) = 25 – 13 Medium (Amber) = 12 - 7 Low (Green) = 6 - 1

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Further Action Needed	RAG Progress	RAG rating	risk
1	Online Safety	<p>A) Extremist organisations are able to radicalise students online and encourage them to commit acts of violence or incite others to commit acts of violence as ‘lone actors’.</p> <p>B) Students (and employees) are able to access unlawful radicalising material which promotes proscribed terrorist groups.</p>	20 High	<ul style="list-style-type: none"> DFE Prevent Coordinator and Head of IT have reviewed IT and E-Safety policy and procedures to ensure Prevent duties are referenced and adhered to - this is in place E-safety mandatory training in place for all employees as part of mandatory training programme E-safety forms part of the new starter induction Programme of E-safety activities undertaken by students as part of induction and tutorial programme Web filtering is in place and a scheduled report has been developed to show any terrorism or radicalisation activity that falls into the extremist category Weekly web reports sent to Director of Services for Students to identify areas of concern – reports show student access and number of hits to potentially inappropriate websites DfE Prevent Coordinator regularly provides an updated list of web filtering key words so blocking system is responsive to current narrative. Established vetting system in place regarding external speaker materials Safeguarding Guidance for Remote Teaching and Learning added to the Safeguarding Policy October 2020 update 	10 Medium	<p>Ongoing - Ensure web filtering system is current via proscribed group/extremist narrative updates via Prevent Steering Group/DfE FE Prevent Lead.</p> <ul style="list-style-type: none"> DFE Prevent lead to provide current key words document – send to IT to update web filtering system. 			
2	Partnership	The organisation does not establish effective partnerships with organisations such as the Local Authority, Police Prevent Team, DfE Regional Coordinator and others.	12 Medium	<ul style="list-style-type: none"> The Prevent Lead for DCG is the Director of Services for Students, and also the College’s Designated Safeguarding Lead who is responsible for the development and oversight of the Prevent Action Plan and updates to SLT 	4 Low				

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		The result is that the organisation is not fully appraised of national and local risks and does not have access to developing good practice advice or supportive peer networks.		<ul style="list-style-type: none"> The Director of Services for Students is a member of the Derby City Prevent Steering Group, a multi-agency partnership. Membership of these groups commenced in 2011 The College meets regularly with the DfE FE/HE Prevent Lead who is also member of the Derby City Prevent Steering Group. The College Prevent Lead is familiar with both Local Authority and Police Prevent Leads and makes use of these leads for risk and threat updates, guidance and advice and for Channel referrals Director of Services for Students contributes to the Counter Terrorism Local Profile report in partnership with steering group partners Director of Services for Students established European partnerships with a visit the Netherlands in May 2017 to share good practice with European partners as part of an Erasmus project. Director of Services for Students is a member of the East Midlands FE Prevent Group who meet on a termly basis. Director of Services for Students is a member of the Derby Education Hub, which is a subgroup of the DCSPB and has representation from all areas of education within the City Team Manager of Student Engagement attends community cohesion group in Derby City. Regular Prevent Updates by the Prevent Coordinator/Community Cohesion, Derby City Council team to safeguarding officers DSL & Deputy DSL attend the annual Prevent East Midlands multi agency conference DCG contributes annually to the Derby city/Derbyshire Counter Terrorism Local Profile. Prevent action plan reviewed to ensure priorities link to local profile. 					
3	Leadership	<p>Leaders within the organisation do not understand the requirements of the Prevent Statutory Duty or the risks faced by the organisation and the Duty is not managed or enabled at a sufficiently senior level.</p> <p>The result is that the organisation does not attach sufficient priority to Prevent Action plans (or does not have one) and therefore action to mitigate risks and meet the requirements of the Duty are not effective.</p>	16 High	<ul style="list-style-type: none"> SLT are provided with briefings by DfE HE/FE Prevent Coordinator Governor with responsibilities for Safeguarding and Prevent receives Prevent Briefing update from College Prevent Lead via Exec DSL group Prevent risk assessment and action plan is a standing agenda item at the College's Safeguarding Board and updates on progress are provided Monthly meeting with Governor to update on key safeguarding developments/ concerns (DSL Group) Regular Risk and Threat updates provided by Prevent lead to SLT via Safeguarding Board. SLT membership and attendance at the Derby/Derbyshire Prevent Steering Group 	4 Low	<p>Arrange for the Prevent Coordinator to provide a Prevent Briefing update for SLT</p> <p>Date tbc subject to availability</p>			

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				<ul style="list-style-type: none"> Safeguarding Officers receive regular Prevent updates from DfE Prevent Lead/College Prevent Lead Mandatory Prevent/Channel online training rolled out and embedded as mandatory for all support/delivery employees, managers and leaders (including subcontractors/national assessor team and Student Union) from August 2015 to date and integrated into new starter induction training package All employees complete the Prevent online module provided by the ETF. Now part of College induction programme for new employees. Prevent reported to SLT and Governors via monthly OQPR/ Annual Safeguarding Report/ Safeguarding Board and DSL meetings with CEO Prevent FE lead has delivered governor Prevent Briefing and X Right Wing briefing to Safeguarding Team 					
4	Employee training and awareness	<p>A) Employees are not aware of the factors that make people vulnerable to radicalisation and terrorism and are unable to recognise the signs of vulnerability and therefore are unable or unwilling to refer concerns.</p> <p>B) Leaders and employees feel unable or unwilling to challenge extremist narratives or exemplify British Values throughout the organisation.</p> <p>C) Employees are unclear on how to deal with or refer concerns resulting in individuals not being supported and potentially radicalisation remaining unchecked.</p>	12 Medium	<ul style="list-style-type: none"> Safeguarding Officers receive regular Prevent updates from DfE Prevent Lead/College Prevent Lead Prevent Update articles included in the DCG termly safeguarding newsletter Mandatory Prevent/Channel online training rolled out and embedded as mandatory for all support/delivery employees, managers and leaders (including subcontractors/national assessor team and Student Union) from August 2015 to date and integrated into new starter induction training package All employees complete the Prevent online module provided by the ETF. Now part of College induction programme for new employees. Prevent reported to SLT/Exec/Governor via monthly Annual Safeguarding Report/ Exec DSL Group/Safeguarding. Prevent FE lead has delivered governor Prevent Briefing and X Right Wing briefing to Safeguarding Team DCG is an active member of Derby City/Derbyshire Prevent Steering Group. This embeds links into the Channel Group and information sharing takes place with all key stakeholders Bespoke training has been delivered by counter terrorism regional police leads/DCG safeguarding team to targeted front line employees e.g. estates, cleaners, campus operations, security, call centre, reception and student services teams. This training has included; suspect packages and bomb threat phone calls The Regional Prevent Coordinator has delivered WRAP 3 training to safeguarding officers and wider support teams 	4 Low	<p>DfE Prevent Coordinator to attend Safeguarding Officer meeting to provided update re Prevent and Counter Terrorism Local Profile.</p> <p>By March 2021</p>			

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				<ul style="list-style-type: none"> • Run Hide Tell training rolled out to all staff – and refresher reminders issued • Schedule of British Values workshops rolled out for delivery employees as part of College wide CPD offer in place. • Session on The Dark Web delivered by Counter Terrorism police to safeguarding officers 					
5	Speakers and events	<p>A) Extremist organisations are given a platform to radicalise young people because the organisation has ineffective processes in the place for vetting speakers and events.</p> <p>B) Inappropriate or extremist materials are shared with students (face to face or via weblinks) because insufficient checks are made of external speakers and materials that they promote or share.</p>	9 Medium	<ul style="list-style-type: none"> • The duty to monitor and actively assess the risk of external speakers and events has been incorporated in the Safeguarding Policy • A process and related guidance document has been produced for all those responsible for arranging events or external speakers to use in order to minimise risk • A risk assessment process and database for external speakers and events has been produced and implemented • Speakers have to provide the College with any presentation materials prior to delivery for vetting • The risk assessment process has been communicated to all relevant managers via Team Managers Meetings, Team Meetings and with Events Team and Student Union • Risk Assessment database now in place to monitor assessments which is updated on an annual basis 	4 Low				
6	Welfare & Pastoral Care	The College does not provide effective welfare and pastoral support which results in students (and employees) being unsupported and the risk of vulnerabilities being exploited.	9 Medium	<ul style="list-style-type: none"> • The College has a range of well-established pastoral support services which include: counselling, progression coaching, student welfare and information, advice and guidance services • The Welfare Team are based at each site and work with vulnerable students including those with mental health issues, students who are looked after and students at risk of dropping out of learning. They work in a multi-agency remit and make referrals to the integrated youth support teams in Derby City and Derbyshire County Council • The College has established effective working partnerships with a range of external organisations to support students • The Progression Coach team work closely with and complement the work of academic employees in monitoring, reviewing and checking student progress. Their primary function is to work with 'at risk' students, i.e. those who are experiencing personal, social and safeguarding issues • The Progression Coach team deliver tutorials and arrange enrichment activities which promote British Values, citizenship and equality of opportunity. This also embeds safeguarding and health & wellbeing and actively promotes cultural diversity 	4 Low	<p>Refresh Prevent resources for tutorial/enrichment delivery - resources provided by Prevent Lead September 2020</p> <p>Add Run Hide Tell training video added to Tutorial Programme in response to increase in terrorist threat level from substantial to severe. Related guidance issued to staff teams.</p> <p>Run Hide Tell guidance promoted by marketing on TV screens/till points//social media etc November 2020</p>			

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				<ul style="list-style-type: none"> The College has a trained team of Safeguarding Officers who work across the College and deal with safeguarding referrals. The team have received WRAP training and Prevent briefings on a regular basis Safeguarding, Welfare support, discipline and behaviour referrals in relation to Prevent are monitored on a monthly and annual basis to the Director of Services for Students/ Prevent Lead. This enables analysis of patterns and trends of students and student groups to be monitored and actions implemented to address these issues. Support services to address these issues are also monitored and agreed via the Safeguarding. The Diversity Calendar already promotes British Values. Curriculum and College activities over the academic year promote volunteering, inclusion, sustainability, health and wellbeing, fundraising, celebration of key festivals etc. British Values and Prevent Posters on display in classrooms/communal British Values and Prevent promoted in Student Handbook Prevent and British Values information leaflets sent to all apprentices, work placed students and subcontracted students Workplace providers issued with British Values and Prevent information to include in NVQ portfolios Open centre Team provide drop in sessions at each college site (NB – not currently due to COVID safety measures) 					
7	Prayer & Faith Facilities	<p>A) Requirements of students (or employees) requiring faith support or the use of facilities are not met by the organisation resulting in individuals seeking external support of unknown suitability.</p> <p>B) Facilities (either prayer rooms or quiet space type facilities) provided are not effectively managed or supervised and become ungoverned spaces where radicalising, inappropriate or dangerous activities can take place.</p>	12 Medium	<ul style="list-style-type: none"> Multi-faith and Reflection Rooms (or appropriate space) are provided across College sites Access and use of these areas is logged and monitored by each site Estates team/Head of Campus to ensure that they are used appropriately 	4 Low				
8	Work based students	A) The organisation does not have robust processes in place to protect work based students	9 Medium	<ul style="list-style-type: none"> Prevent and British Values embedded in work-based student induction, review and assessment process. 	4 Low	DFE Prevent Lead to deliver a Prevent Workshop for Work Based Assessors			

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		<p>from the risks of radicalisation or views and practices contrary to British Values.</p> <p>B) Employers within work based settings are unaware of issues relating to Prevent the Statutory Duty and how to report concerns.</p>		<ul style="list-style-type: none"> • Work Based students receive Prevent and British Values information leaflets • Employers display Prevent and British Values posters (including how to report concerns) • The Subcontractor Health Safety and Safeguarding Assessment record has been reviewed and updated to include explicit reference to the Prevent Duty • Work based students are made aware that if they have any concerns they can speak to their Assessor, who will then liaise with the College's safeguarding team 		Date tbc subject to availability			
9	Promoting British Values	<p>A) The College does not have a culture and ethos where British Values are celebrated, which leads to a culture of disrespect and intolerance and where tensions are allowed to flourish.</p> <p>B) Employees and students do not understand BV (or feel confident about) and extremist views and narratives are allowed to flourish unchallenged.</p>	9 Medium	<ul style="list-style-type: none"> • Promotion of BV to students via Induction, Posters and leaflets, Character Education and Enrichment programme • BV embedded in standard cross College scheme of work template and tutorial scheme of work 	1 Low				
10	Campus Security	<p>A) The College does not have sufficient security of its premises and students are targeted by individuals or groups seeking to share their extremist views or endanger their personal safety.</p> <p>B) Charities are allowed on campus without effective checks or charitable collections are inadvertently diverted to inappropriate or unlawful causes.</p> <p>C) On site dangerous or hazardous substances are not kept secure and are allowed into the possession of individuals or groups seeking to use them unlawfully.</p>	9 Medium	<ul style="list-style-type: none"> • Access control systems in place at the Roundhouse, Johnson Building, Hudson Building, JWC, Ilkeston, Broomfield Hall (Haddon, Residences, Nursery) • All campuses have a security presence and CCTV • 'Keeping you safe' forms part of the new starter induction and includes College security protocols and personal safety • A visitor protocol is in place, together with a Control of Contractors Policy • There is a policy and code of conduct regarding the wearing of ID badges which is actively enforced with students, employees and visitors • The College has a Control of Substances Hazardous to Health Policy • Access to hazardous substances is restricted by the use of locked storage facilities, key management systems • Control of hazardous substances forms part of the health and safety inspection and audit programme • Risk assessments are in place for hazardous substances brought into the College • DCG has a COSHH database which details quantities of chemicals held within the College 	2 Low				

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				<ul style="list-style-type: none"> • Training has taken place with key employees with regards to recruitment techniques, e.g. types of propaganda, group activity • The display of leaflets and posters are regulated by the Campus Operations Management team • All electronic leaflets are regulated via the ILT team • Safeguarding protocols are implemented where off campus activities are identified as a risk to students or employees • Any work involving charities is overseen by College employees • Meet and Greet/Positive Behaviour Rota established which supports security on campus. 					
11	Incident Management	<ul style="list-style-type: none"> • The College does not have a critical incident management plan which is capable of dealing terrorist related issues • The College does not have a suitably trained and informed person identified to lead on the response to such an incident • The Communications/Media Department does not understand the nature of such an incident and the response that may be required 	16 High	<ul style="list-style-type: none"> • An accident/incident management policy is in place • A Critical Incident/Business Continuity Plan is in place, which details key personnel with identified roles in the event of an incident occurring, including the role of the Marketing Department vis-à-vis dealing with the media • DCG has strong links with East Midlands Counter Terrorism Team and regularly takes part in desk top exercises, linking in with key partners in the city • DCG has strong links with key partners, particularly on Pride Park, Derby e.g. East Midlands Trains • An alert system (Alertus) is in place on all College campuses • The Alertus App has been downloaded onto all College issued mobile phones • Mock terrorist emergency evacuation/invacuation exercises took place on 16 December 2016 across all College campuses in order to test the emergency response systems. • Knife attack scenario with Counter Terrorism Police took place at JWC on 12 July 2018 • DSL team attended multi agency training day at Derbyshire Constabulary HQ to undertake tabletop Prevent scenario exercise - March 2019 • Stay Safe and Keeping you Safe is mandatory for all employees and forms part of the College new starter induction • The College has a Hostile Attack Policy which clearly documents key roles and responsibilities • Employees have undergone a programme of training commensurate with their role within the College, i.e. searching techniques, the role of the Duty Safety Officer when dealing with a hostile attack, receiving a bomb threat call 	5 Medium	Run Hide Tell training video issued to employees for a refresher following the change of Terrorist threat level from 'substantial' to 'severe' November 2020			